

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

ACI-SCC JV, et. al.
through their Trustee, Arwand Road
and Construction Company,
Plaintiffs,

v.

UNITED STATES OF AMERICA,
Defendant

Case No. 1:17-cv-01749-TCW

Judge Thomas C. Wheeler

**DECLARATION OF WAHID AHMADI IN SUPPORT OF THE
PLAINTIFFS' TRUSTEE'S MOTION FOR PARTIAL SUMMARY
JUDGMENT ON COUNT I, TRUSTEE'S DEMAND FOR SATISFACTION
FOLLOWING ACCORD**

I, Wahid Ahmadi declare as follows:

I am a citizen of Afghanistan, and am familiar with the business records and record keeping of Arwand Road and Construction Company ("Arwand") and have been appointed by the company to review and organize the company's records related to contract disputes.

1 I have personal knowledge of all facts stated herein and, if called to testify at hearing or trial, am competent to testify regarding the matters set forth in this declaration.


2 Exhibit 1. The document listed as Exhibit 1 in support of the motion for summary judgment is a true and correct copy of the contract, maintained in Arwand's business records, between Arwand and ACI-SCC JV and Advanced

Constructors International LLC (“ACI”) dated July 26, 2011 and signed on January 19, 2012.

3 Exhibit 15. The document listed as Exhibit 15 is a copy of a letter that Arwand’s attorney received from Bilal Adil Construction Company. Richard Moorhouse at Greenberg Traurig was the attorney for the Plaintiff, ACI, before it lost its capacity to operate. Arwand is the Trustee of ACI’s assets, including its records. On behalf of ACI’s Trustee, Arwand, I hold this letter as a business record.

4 Exhibit 22. The document listed as Exhibit 22 is the certification of claim that I signed on November 11, 2016.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 15, 2017

Sign:  e-Signed by Wahid Ahmadi
on 2017-11-15 06:03:30 GMT

Wahid Ahmadi